

I am a former Purple employee. They closed their Hawaii office.

The FCC rulings will have significant impact on how VRS operates today and how it will continue to evolve.

Paragraphs 17 - 18

The location of a call center, be it in the US or beyond its borders, is not the heart of the issue. If the FCC is truly concerned about VRS providers using qualified ASL interpreters, the focus of the ruling should be on the qualifications of interpreters in ANY call center regardless of location. As certified interpreters, we believe the FCC should make a ruling mandating national certification as minimum interpreter (CA) certification requirements as well as a minimum of 3-5 years of interpreting experience. This would in turn naturally determine where call centers form. If qualified interpreters as defined by the FCC, do not exist in an area, there will be no incentive for VRS providers to establish a call center in that location. Additionally, it would discourage VRS providers from hiring non-certified interpreters and newly certified interpreters just out of an interpreter training program to bring down their cost of operation and increase their profit margin.

Deaf patrons of VRS deserve to have the most highly qualified interpreters processing their calls to ensure functional equivalency. With the current proposed rate reduction, if no measure is put into place requiring minimum qualifications and compensation, the quality of VRS interpreting services will likely degrade as VRS providers seek to minimize costs by lowering CA rates of pay and by hiring less qualified, non-certified interpreters to process calls. When pay rates are reduced, truly qualified interpreters who are in demand everywhere will look for employment elsewhere leaving less qualified interpreters available for work in the VRS industry.

In addressing the legitimacy of minutes processed in call centers outside of the US, the issue is not the location of the call center but the climate of the management team overseeing VRS operations. VRS management need to hold CAs accountable for ensuring they only process legitimate calls in all of their call centers. In turn, CAs need whistleblower protection so they can hold VRS management accountable for processing only legitimate minutes. The reality is that when VRS management force CAs to process calls that make CAs feel uncomfortable there is currently no protected form of recourse. We strongly feel that instituting whistleblower protection for CAs will be extremely effective in eliminating fraudulent calls from being processed and billed. Additionally, technology exists that permit the virtual monitoring of calls randomly to ensure the legitimacy of minutes although most VRS providers do not use such technology. The FCC may want to consider requiring the use of such technology by all VRS providers

Paragraph 19 - 21:

With respect to the use of interpreters working from call center offices at home, we argue that security

and privacy to be enhanced in comparison to traditional call center arrangements. Traditional call centers allow for interpreters to peer in on one another during calls, and overhear calls from nearby cubicles which compromises caller confidentiality and security as a matter of course. VRS providers with CAs operating from call centers located at their homes adhere to security and confidentiality requirements of the FCC and are held strictly responsible for adherence to these requirements. LifeLinks uses a platform with technology that enables management to monitor calls remotely to ensure no one else is in the room and that call information is being handled appropriately. Remote monitoring provides CAs with the support needed and privacy required without the high overhead of large call centers that actually compromise caller confidentiality. Additionally, we use technology that allows for transfers of calls when necessary. Furthermore, call centers located at home locations allows interpreters who would otherwise be unable to work due to geographic limitations, the chance to do so thereby mitigating the impact of interpreter scarcity.

Purple closed the Hawaii call center because the operation of a call center in Hawaii is "cost prohibitive" in comparison to call centers in cities on the Continental US. The likelihood of another VRS provider establishing a call center here is nil. We have 20+ certified interpreters with VRS experience here who were laid off and remain unemployed, but who ready and available to work. Working from home is likely the only option for these interpreter to regain employment. If working from home processing VRS calls is no longer supported by the FCC, Deaf consumers in Hawaii will never have the remote possibility of using a service where they may get an interpreter who understands them 100% making true functional equivalency elusive and may eventually result in the reduction of ASL interpreters available for the community as interpreters move to locations outside of the state that offer VRS employment.

We support the treatment of at home call centers as "call centers" that adhere to the same FCC reporting requirements as outlined in V.E.3.

Paragraph 45 -48:

The topic of White Labels is one that many larger companies take exception with because of the significant appeal these local organizations have to Deaf consumers and CAs (VRS interpreters). In communities across the US small boutique VRS companies are starting up through subcontractor agreements with licensed VRS providers, and the response has been tremendously positive. These are not large corporate entities making multi-million dollars for the benefit of investors. These are trustworthy small businesses and service providers from within their communities. Deaf consumers trust the quality and confidentiality of these service providers and the appeal is growing. Large providers like Sorenson and Purple (formerly GoAmecia) feel threatened by small boutique VRS companies because they are not only attractive to Deaf consumers, they are attractive to there current workforce. They are feeling pressure from CAs that work for their companies to offer the option of working from home and are experiencing the loss of their most qualified CAs to such "white

label" companies, eroding the competitive position of the larger VRS players. While the concern over legitimacy of minutes persists, it is incumbent that we hold licensed providers accountable so they continue to be vigilant and to ensure that abuses are curtailed and abusers are shut down.

White Label entities are a key link to smaller groups of Deaf consumers that are often overlooked and have been key to improving the quality of VRS interpreting services. The poor decisions made by select groups of individuals and their unconscionable should not be used to substantiate biases against ethical business providers and an otherwise effective method of conducting business.